

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

Karen Browne

Debtor(s)

U.S. BANK NATIONAL ASSOCIATION, AS
TRUSTEE SUCCESSOR IN THE INTEREST TO
BANK OF AMERICA, NATIONAL ASSOCIATION
AS TRUSTEE AS SUCCESSOR BY MERGER TO
LASALLE BANK NATIONAL ASSOCIATION, AS
TRUSTEE FOR CERTIFICATEHOLDERS OF BEAR
STEARNS ASSET BACKED SECURITIES

Movant

vs.

Karen Browne

Debtor(s)

Kenneth E. West

Trustee

CHAPTER 13

NO. 22-10662 ELF

11 U.S.C. Section 362

STIPULATION

AND NOW, it is hereby stipulated and agreed by and between the undersigned as follows:

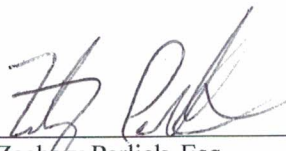
1. Movant is the legal owner of the premises pursuant to a Deed from the Office of the Sheriff of Philadelphia County. The Sheriff's Deed was recorded on December 3, 2019 as Document ID Number 53599309 the Philadelphia County Record of Deeds.
2. On February 28, 2020, Movant commenced an action in ejectment for possession of the premises.
3. The ejectment proceedings were stayed by the instant bankruptcy filing on March 17, 2022.
4. The parties now agree that the automatic stay shall be vacated upon Court approval of this Stipulation to allow Movant and/or any successors in interest to proceed with the ejectment action regarding the premises 604 Walnut Lane, Philadelphia PA 19128.
5. Furthermore, further bankruptcy filings by either Debtor(s) and/or Occupants for a period of one hundred eighty (180) days hereof will not prevent the Movant from proceeding with its ejectment action.

6. The stay provided by Bankruptcy Rule 4001(a)(3) is waived.
7. The parties agree that a facsimile signature shall be considered an original signature.

Date: April 12, 2022

/s/Rebecca A. Solarz, Esq.
Rebecca A. Solarz, Esq.
Attorney for Movant

Date: 4-12-22


Zachary Perlick, Esq.
Attorney for Debtor(s)

Date: 4/26/2022

/s/ Leroy W. Etheridge, Esquire for *
Kenneth E. West, Esq.
Chapter 13 Trustee

**No objections to its terms,
without prejudice to any of our
rights and remedies*

Approved by the Court this _____ day of _____, 2022. However, the court retains discretion regarding entry of any further order.

Bankruptcy Judge
Eric L. Frank